

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

ABBVIE INC., et al.,

Defendants.

Case Number: 2:14-CV-5151-HB

**Declaration in Support of Plaintiff Federal Trade Commission’s
Motion to Compel AbbVie Defendants to Produce Documents Improperly
Withheld on Privilege Grounds from their Georgia Privilege Logs**

I, Patricia M. McDermott, declare as follows:

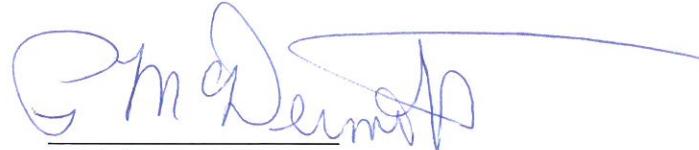
1. I am an attorney licensed to practice in the District of Columbia representing the Federal Trade Commission (“FTC”) in the above-captioned matter. I made my appearance in this case pursuant to Local Rule 83.5(e).
2. I submit this declaration in support of the FTC’s Motion to Compel AbbVie Defendants to Produce Documents Improperly Withheld on Privilege Grounds from their Georgia Privilege Logs.
3. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the privilege log entries challenged by the FTC in this motion. Exhibit 1 is a compilation of entries from the privilege logs AbbVie Defendants produced on June 13 and 14, 2016.
4. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the privilege log entries challenged by the FTC in this motion. Exhibit 2 is a compilation of entries from

the privilege logs AbbVie Defendants produced on June 13 and 14, 2016. The highlighted entries indicate the sample entries for the Court's review.

5. Attached hereto as Exhibit 3 is a true and accurate copy of a letter from Patricia McDermott, Esq. to Adam Lawton, Esq. dated May 17, 2016.
6. Attached hereto as Exhibit 4 is a true and accurate copy of a letter from Joel Purles, Esq. to Patricia McDermott, Esq. dated May 31, 2016.
7. Attached hereto as Exhibit 5 is a true and accurate copy of a letter from Joel Purles, Esq. to Patricia McDermott, Esq. dated June 29, 2016.
8. Attached hereto as Exhibit 6 is a true and accurate copy of a letter from Joel Purles, Esq. to Patricia McDermott, Esq. dated June 30, 2016.
9. Attached hereto as Exhibit 7 is a true and accurate copy of Entry 2858 of AbbVie Defendants' June 13 Privilege Log.
10. Attached hereto as Exhibit 8 is a true and accurate copy of the document produced in this litigation and bearing the bates numbers AGEL-PA-006-0001804 through AGEL-PA-006-0001806.
11. Attached hereto as Exhibit 9 is a true and accurate copy of the document produced in this litigation and bearing the bates number ABBIVE-AGEL03140748.
12. Attached hereto as Exhibit 10 is a true and accurate copy of the document produced in this litigation and bearing the bates number ABBVIE-AGEL03138957.

I declare under penalty of perjury that the foregoing is true and correct

Dated: June 30, 2016



Patricia M. McDermott